

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re:	Chapter 11
Stream TV Networks, Inc., ¹	Bky. No. 23-10763 (MDC)
Debtor.	
In re:	Chapter 11
Technovative Media, Inc.,	Bky. No. 23-10764 (MDC)
Debtor.	(Jointly Administered)

**NOTICE OF ERRATA TO SUBMISSION OF LOCAL RULE 2016-5
CORRECTED FIRST, SECOND, THIRD, FIRST INTERIM, AND FIFTH REQUESTS
ON ACCOUNT FOR COMPENSATION AND REIMBURSEMENT OF EXPENSES
OF LEWIS BRISBOIS BISGAARD & SMITH, LLP, COUNSEL FOR THE DEBTORS,
FOR THE PERIODS MARCH 15, 2023 THROUGH APRIL 30, 2023, MAY 1, 2023
THROUGH MAY 31, 2023, JUNE 1, 2023 THROUGH
JULY 31, 2023, AND
OCTOBER 1, 2023 THROUGH NOVEMBER 30, 2023**

Lewis Brisbois Bisgaard and Smith, LLP, counsel for Debtors Stream TV Networks, Inc. and Technovative Media, Inc. (hereafter “**LBBS**”), hereby submits this Notice of Errata to their First Request for Payment on Account for Compensation and Reimbursement of Expenses of Lewis Brisbois Bisgaard & Smith, LLP, Counsel for the Debtors, for the Period March 15, 2023 through April 30, 2023² (**March/April Application**), their Second Request for Payment on Account for Compensation and Reimbursement of Expenses of Lewis Brisbois Bisgaard & Smith, LLP, Counsel for the Debtors, for the Period May 1, 2023 through May 31, 2023³ (“**May**

¹ The Debtors, along with the last four digits of the Debtors’ federal tax identification numbers, are Stream TV Networks, Inc. (4092) and Technovative Media, Inc. (5015). The location of the Debtors’ service address is: 2009 Chestnut Street, 3rd Floor, Philadelphia, PA 19103.

² Filed on September 12, 2023 at D.I. 409.

³ Filed on November 9, 2023 at D.I. 461.

Application”), their Third Request for Payment on Account for Compensation and Reimbursement of Expenses of Lewis Brisbois Bisgaard & Smith, LLP, Counsel for the Debtors, for the Period June 1, 2023 through June 30, 2023 and July 1, 2023 through July 31, 2023⁴ (the “**June/July Application**”), their First Interim Application for Compensation and Reimbursement of Expenses of Lewis Brisbois Bisgaard & Smith, LLP, Counsel for the Debtors, for the Period March 15, 2023 through July 31, 2023⁵ (the “**First Interim Application**”), and their Fifth Request for Payment on Account for Compensation and Reimbursement of Expenses of Lewis Brisbois Bisgaard & Smith, LLP, Counsel for the Debtors, for the Periods October 1, 2023 through October 31, 2023 and November 1, 2023 through November 30, 2023⁶ (the “**October/November Application**”), to correct certain errors caused by a software issue or by typographic error. (“Errata”).

I. March/April Application

The March/April Application filed on September 12, 2023 [D.I. 409] was correct. The incorrect version of the invoice was filed as Exhibit A [D.I. 409-1]. The invoice was corrected to address corrections to technical errors caused by our accounting software where requested edits to accurately record adjustments made to line items within certain categories in the edited applications did not appear in the finalized invoices. There is no adjustment to the total amount of the invoice. Attached hereto as Exhibit 1 to this Notice is the correct final invoice to the March/April Application.⁷

⁴ Filed December 15, 2023 at D.I. 523

⁵ Filed January 4, 2024 at D.I. 544.

⁶ Filed January 17, 2024 at D.I. 563

⁷ A complete corrected version of the March/April Application is attached as Exhibit 1.

II. May Application

The May Application filed on November 9, 2023 [D.I. 461] is correct. The incorrect invoice was inadvertently uploaded as Exhibit A to the May Application at the time of filing. [D.I. 461-1]. The invoice was corrected to reflect a write down made to a line item within billing code B110 (Case Administration). The final invoice now comports with the May Application, as filed. The final invoice reflects a difference (and reduction) of \$55.00 in the amount of the total fees requested in the May Application. Attached hereto as Exhibit 2 to this Notice is the correct final invoice to the May Application.⁸

III. June/July Application

The June/July Application and the July invoice, which was attached as Exhibit B [D.I. 523-2] to the Application, requires corrections to technical errors caused by our accounting software where requested edits to accurately record adjustments made to line items within certain categories in the edited applications did not appear in the finalized invoices, or was due to typographic error.

The June/July Application includes errors in four separate coding categories. The first error appears in billing code B220 (Employee Benefits/Pensions). The July invoice includes time of 2.00 and fees of \$1,950.00 billed to this category. LBBS manually moved the line item billed under this category to billing code B160 (Fee Applications), and reflected this change in the Application, however, the technical error caused by the firm's accounting software did not properly adjust this line item to the appropriate coding category in the final invoice. The second error occurs in billing code B320 (Plan and Disclosure Statement). The July invoice is correct as to the total hours (216.20) and total fees of \$120,581.50 for the billing category. The June/July

⁸ A complete corrected version of the May Application is attached as Exhibit 2.

Application, however, reflects a typographical error for the fees (\$12,581.50) in July 2023, which resulted in a discrepancy between the invoice and the June/July Application in the amount of \$108,000.00. The typo of \$12,581.50 is missing a zero and should have read \$120,581.50 in the Application to match the invoice. The third error occurs in billing code B410 (General Bankruptcy Advice/Opinions). The July invoice included hours (2.90) and fees (\$1,515.00) incorrectly categorized at the time of fee entry. LBBS manually moved all line items posted under that category prior to filing as follows: (a) Fees: \$275.00 / Hours: 0.50 to billing code B320 (Financing/Cash Collections); (b) Fees: \$1,100.00 / Hours: 2.00 to billing code B320 (Plan and Disclosure Statement); and (c) Fees: \$140.00 / Hours: 0.40 to billing code B210 (Business Administration), however, the final invoice attached as Exhibit B to the June/July Application did not reflect the changes. The last error occurs in Code B430 (Hearings). The invoice for July 2023 correctly reflects hours (4.30) and fees in amount of (\$1,182.50). The June/July Application reflects a typographical error for the July 2023 fees (\$1,182.00), which is a difference, but not a reduction, in the amount of \$.50. A corrected LBBS June/July Application (with corrected fee categories highlighted in bold) and corrected July final invoice, are attached as Exhibit 3.⁹ A blackline version of the LBBS June/July Application is attached as Exhibit 4.

IV. First Interim Application

The First Interim Application requires corrections based on the aforementioned Errata. LBBS updated the Summary of Prior Applications, Attorneys Billing for Current Period and Part C-Billing Summary, to reflect and account for the correct invoices to the March/April Application and the May Application, and a corrected invoice for July 1, 2023 through July 31, 2023, with the

⁹ A complete corrected version of the June/July Application is attached as Exhibit 3 and blackline version as Exhibit 4.

corrected June/July Application, to provide the correct amount of total fees billed in accordance with Federal Rule of Bankruptcy Procedure 2016 and Local Bankruptcy Rule 2016-5, the requested award of compensation. Attached as Exhibit 5 is a corrected chart outlining the Summary of Prior Applications. A corrected LBBS 1st Interim Application is attached as Exhibit 6 (with corrections highlighted in bold) and a blackline version of the LBBS First Interim Application is attached as Exhibit 7.

The **total variance in fees** during the First Interim Application Period from March 15, 2023 through July 31, 2023 (the “Compensation Period”) , resulted in a **reduction in fees of \$55.50** in the aggregate.

V. October/November Application

The October/November Application includes one error in Code B230 (Financing/ Cash Collection), which includes a typographic error reflecting fees in the amount of \$2,645.00 and hours of 3.0 for the month of October. The previously filed invoice for October/November is correct, which does not include any hours or fees billed to this category, therefore, there is no adjustment to the total amount of the invoice. A corrected version of the October/November Application is attached hereto as Exhibit 8.¹⁰ A blackline version of the October/November Application is attached hereto as Exhibit 9.

There is no variance in fees during the Compensation Period from October 1, 2023 through November 30, 2023.

VI. Total Discrepancy in Fees

The total variance in fees during the Compensation Period from March 15, 2023 through November 30, 2023, resulted in a **decrease or reduction in fees of \$55.50** in the aggregate.

¹⁰ A complete corrected version of the October/November Application is attached as Exhibit 8.

Date: February 28, 2024

Respectfully submitted,

/s/ Rafael X. Zahralddin-Aravena

Rafael X. Zahralddin-Aravena (PA Bar No. 71510)

LEWIS BRISBOIS BISGAARD & SMITH, LLP

550 E. Swedesford Road, Suite 270

Wayne, PA 19087

Telephone: (302) 985-6000

Facsimile: (302) 985-6001

Rafael.Zahralddin@lewisbrisbois.com

-and-

Bennett G. Fisher (admitted *pro hac vice*)

LEWIS BRISBOIS BISGAARD & SMITH, LLP

24 Greenway Plaza, Suite 1400

Houston, TX 77046

Telephone: (346) 241-4095

Bennett.Fisher@lewisbrisbois.com

-and-

Keith Kodosky (admitted *pro hac vice*)

LEWIS BRISBOIS BISGAARD & SMITH, LLP

600 Peachtree Street NE, Suite 4700

Atlanta, GA 30308

Telephone: (404) 991-21831

Facsimile: (404) 467-8845

Keith.Kodosky@lewisbrisbois.com

-and-

Kevin Shaw (admitted *pro hac vice*)

LEWIS BRISBOIS BISGAARD & SMITH, LLP

500 Delaware Avenue, Suite 700

Wilmington, Delaware 19801

Telephone: (302) 295-9436

Facsimile: (302) 985-6001

Kevin.Shaw@lewisbrisbois.com

-and-

Scott D. Cousins (admitted *pro hac vice*)

LEWIS BRISBOIS BISGAARD & SMITH, LLP

500 Delaware Avenue, Suite 700

Wilmington, Delaware 19801
Telephone: (302) 295-9440
Facsimile: (302) 985-6001
Scott.Cousins@LewisBrisbois.com

Counsel to Debtors